

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JAMES B. LaFRENTZ and ILA)	
LaFRENTZ,)	
)	
Plaintiffs,)	
)	Case No. 4:18-CV-04229
v.)	
)	
3M COMPANY, et al.,)	
)	
Defendants.)	

VIDEOTAPED DEPOSITION OF
JAMES LaFRENTZ - VOLUME II
Taken on Behalf of Plaintiffs
November 15, 2018

Susan L. Law, CCR, CSR

1 **A. No.**

2 Q. Where would you take your smoke breaks?

3 **A. We'd have to go outside.**

4 Q. As far as the 3M 8710 respirator, did you
5 ever see any advertisements for that product?

6 **A. No.**

7 Q. What about any brochures?

8 **A. No, I don't remember any.**

9 Q. What about any literature?

10 **A. Not that I remember.**

11 Q. What about any warnings?

12 **A. No, no warning.**

13 Q. What -- did you ever see an instruction
14 sheet with that 3M 8710?

15 **A. No.**

16 Q. Later on in your career at General Dynamics
17 I understand that you held some security position
18 where you were visiting vendor sites. Is that true?

19 DEFENSE COUNSEL: Objection. Vague.

20 **A. That's correct.**

21 BY MR. JUNG:

22 Q. Were one of the facilities that you visited
23 a 3M facility?

24 **A. It was.**

25 Q. How many -- how many times did you visit a